

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.:
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
RS SEWING, INC.,	)	<u>COMPLAINT</u>
C/O STATUTORY AGENT: RICHARD C.	)	
SPENCER,	)	
	)	
Defendant.	)	
	)	
	)	

JUSTIN E. HERDMAN, United States Attorney for the Northern District of Ohio, on behalf of the United States of America (the “Plaintiff), for his Complaint against RS Sewing, Inc., c/o Statutory Agent, Richard C. Spencer (the “Defendant”) says that:

1. This is a civil action brought on behalf of the United States of America and this court has jurisdiction under the provisions of 28 U.S.C. § 1345.
2. The Defendant resides within the jurisdiction of this Court.
3. The Defendant owes Plaintiff the principal sum of \$17,898.77, plus interest and fees, in connection with workplace safety violations under the Occupational Safety and Health Act of

(1970, 29 U.S.C.650/651 et seq.), as more fully set forth on the Certificate of Indebtedness attached hereto as Exhibit A.

4. Due demand has been made for payment.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

In the amount of \$17,898.77 principal, plus interest of \$779.99 accrued through March 5, 2020, at the rate of 1% per annum, and interest from March 5, 2020 at the rate of 1% per annum to the date of judgment. Additional fees are computed as a Penalty fee of \$4,590.42 accrued through March 5, 2020 at the rate of 6% per annum and interest from March 5, 2020 at the rate of 6% per annum to the date of Judgment, Administrative fee of \$20.00, Debt Management Services Fees of \$7,452.54, and Department of Justice Fees of \$950.77 for a total of \$31,692.49, plus interest at the legal rate from the date of judgment calculated daily and compounded annually plus costs.

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney

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